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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 CALVIN WILLIAMS,

12 Plaintiff,

13 vs.

14 SAFEWAY, INC., a Delaware Corporation,

15 Defendant.
16

No. 2:20-cv-1199

NOTICE OF REMOVAL TO
FEDERAL COURT

17 Please take notice that Defendant Safeway Inc. hereby removes to the United
18 States District Court for the Western District of Washington the action described below.
19 On July 10, 2020, Defendant Safeway Inc. was served with a summons (**Attachment 1**)
20 and complaint (**Attachment 2**) in an action entitled *Calvin Williams v. Safeway, Inc.*, King
21 County Superior Court No. 20-2-07663-5 SEA. Safeway first received a copy of this
22 complaint on April 27, 2020.

23 The complaint does not specify the amount of damages being claimed by the
24 Plaintiff. Pursuant to RCW 4.28.360, Safeway propounded a request for a statement of
25 the damages Plaintiff is claiming in this matter. On July 29, 2020, Plaintiff served

NOTICE OF REMOVAL TO
FEDERAL COURT - 1

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Turner Kugler Law, PLLC

6523 California Ave SW #454
Seattle, WA 98136
(206) 659-0679

1 Safeway with a statement of damages claiming more than \$75,000 in damages in this
2 matter.

3 There is complete diversity because the Plaintiff is a citizen of the State of
4 Washington and Defendant Safeway Inc. is a corporation organized under the laws of the
5 State of Delaware with its principle place of business in the State of California.

6 This court has original jurisdiction over this action pursuant to 28 U.S.C. §1332(a)
7 because it is between citizens of different states and the amount in controversy exceeds
8 \$75,000. This claim is removable to federal court by the defendant pursuant to 28 U.S.C.
9 §1441 based on diversity jurisdiction.

10 A jury demand has been filed in the state court action (**Attachment 3**).

11 INTRADISTRICT ASSIGNMENT

12 The case arises out of an incident which occurred in King County, Washington and
13 the case was originally commenced in King County, Washington. In accordance with
14 LCR 3(e), this case should be assigned to a judge in the Seattle Division.

15 A civil case cover sheet is attached as **Attachment 4**.

16 Dated: August 7, 2020.

17 TURNER KUGLER LAW, PLLC

18 By: s/ John T. Kugler
19 John T. Kugler, WSBA # 19960
Attorney for Defendant Safeway Inc.



1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on August 7, 2020, I electronically filed the foregoing with the
3 Clerk of the Court using the CM/ECF system which will send notification of such filing to
the following:

4 Melissa Odama Hart
5 Odama Law, PLLC
6 155 NE 100th St., Ste. 210
7 Seattle, WA 98125
(206) 402-5214
Melissa@SeattleCarAccidentLawFirm.com

8 and I hereby certify that I have mailed by United States Postal Service the document to
the following non-CM/ECF participants:

9 none

10 s/ John T. Kugler
11 JOHN T. KUGLER, WSB #19960
12 Attorney for Defendant Safeway Inc.
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14 6523 California Ave SW #454
15 Seattle, WA 98136-1833
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